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NAS WHITING FIELD
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LETTER CONFIRMING THE U S NAVY DEVIATION FROM THE FINAL REMEDIAL INVESTIGATION FEASIBILITY STUDY WORK PLAN TO ALLOW FOR ON SITE DISPOSAL OF WELL CUTTINGS NAS WHITING FIELD FL
11/16/1990
NAVFAC SOUTHERN

File
Code 11
NAS Whiting Field

DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
2155 EAGLE DR., P. O. BOX 10068
CHARLESTON, S. C. 29411-0068

03.01.00.0008
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PLEASE ADDRESS REPLY TO THE COMMANDING OFFICER, NOT TO THE SIGNER OF THIS LETTER. REFER TO:

5090
Code 18214
16 NOV 1990

Ms. Nancy Dean
Remedial Project Manager
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, GA 30365

Subj: FINAL RI/FS WORK PLANS (VOLUMES I-III) DATED JUNE 1990 FOR NAS WHITING FIELD, FL

Dear Ms. Dean:

This is to confirm the telephone discussion with Mr. Ted Campbell on 8 November 1990, in which the Navy outlined a deviation from the subject work plans. This change would allow for on-site disposal of well development waters and mud rotary soil cuttings during Phase I at sites which will not exceed toxicity limits according to RCRA criteria. This approach is based on site conditions and results obtained in the 1986 Verification Study. A full justification is provided below:

ON-SITE CUTTINGS DISPOSAL: The purpose of the 6 wells and 2 piezometers slated for installation during Phase I is to obtain background screening information and further-refined potentiometric mapping data. In all 8 cases the wells will be located topographically and hydraulically upgradient from the release site, there is, therefore, no reason to expect soil contamination in either the vadose zone or below the water table. Because the aquifer is expected to be clean in all of these well areas, it is proposed to dispose of the mud rotary cuttings on-site. Further, we propose to perform field monitoring (OVA, sight, and smell) during all drilling activities. Because these sites reportedly received a mix of materials (metals, volatile organics, etc.) the volatiles make an effective indicator of contamination. As such, the OVA monitoring will detect any unexpected contamination during drilling activities. If field monitoring indicates contamination, the cuttings at that site will be drummed, tested, and disposed of accordingly.

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COde 18214

Subj: FINAL RI/FS WORK PLANS (VOLUMES I-III) DATED JUNE 1990 FOR NAS WHITING FIELD, FL

ON-SITE DEVELOPMENT WATER DISPOSAL: Using data from the 1986 Verification Study, only wells located at Sites 3 and 7 require special development water disposal considerations. Table 3-1 of the RI/FS Work Plan, Vol. I, June 1990 summarized these data. In addition, historical information for the period each site was active is located in Table 2-14 of the RI/FS Work Plan, Vol. I, June 1990. Based on the age and/or duration of disposal, equilibrium conditions would have already been established at all sites, and therefore well data would not be expected to be markedly different now than in 1986. Based on maximum concentrations detected vs. regulatory limits for TCLP (except at Sites 3 and 7), there is no likelihood that the development water would be toxic according to RCRA criteria. Thus, the most effective approach is to dispose of the waters on-site unless field monitoring indicates drumming and testing is appropriate. Finally, because we belive there is a need to drum the development waters at sites 3 and 7, we will postpone the slug tests at these two sites until the well sampling is performed during Phase II. This will minimize the quantity of potential hazardous waste created at sites 3 and 7.

The Navy believes this work plan deviation to be the most effective and appropriate approach for Phase I activities. We appreciate your continued input into this project. If you have any questions, comments, or concerns, please call Mr. Ted Campbell at (803) 743-0576.

Sincerely,

G. R. BRADLEY, P.E.
HEAD, REMEDIAL ACTIVITIES BRANCH

Copy to:
Eric Nuzie, FDER
Jim Holland, NAS Whiting Field
Michael Keirn, ABB Inc.
Project Files, SOUTHDIV